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MSAPC ADVISORY CIRCULAR

U.S. ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF AIR AND WATER PROGRAMS • OFFICE OF MOBILE SOURCE AIR POLLUTION CONTROL

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SUBJECT: Inertia Weight Testing Option -- Relationship to Coverage
of Certificate of Conformity

A. Purpose

The purpose of this Advisory Circular is to provide guidance to those manufacturers who choose to exercise the option concerning emission testing at the higher inertia weight class which is available under 40 CFR §§85.074-7; 85.075-7; 85.175-7, and 85.275-7; and to advise manufacturers regarding the effect of inertia weight classification on the coverage of Certificates of Conformity.

B. Background

1. Sections 85.074-7; 85.075-7; 85.175-7 and 85.275-7 of 40 CFR provide an option to the manufacturers that "...if the (estimated) loaded vehicle weight is within 100 pounds of being included in the next higher inertia weight class as specified in (§§85.074-15(d); 85.075-15(d); 85.175-13(d) and 85.275-15(d) respectively), the manufacturer may elect to conduct the respective emission tests at the inertia weight corresponding to the higher loaded vehicle weight." This option was made available so that manufacturers could assure themselves that, in the event of the estimate of inertia weight having been too low, vehicles will have demonstrated compliance with the applicable emission standards at the actual inertia weight class. Manufacturers have raised several questions relating to the coverage of Certificates of Conformity issued under this option.

2. The estimated vehicle curb weight reported in the application for certification must be a good faith engineering estimate based on analysis of the forthcoming model year vehicle drawings and designs, previous years' experience concerning actual production vehicle weights, and any other information available to the manufacturer at the time of submission of the application which would aid in the determination of vehicle weight. The concept of a "good faith estimate" requires that any change in the vehicle design or its parameters which occurs prior to obtaining certification and which would affect the original inertia weight class estimate must be reported to EPA as an amendment to the application for certification. Any such change which occurs after the Certificate of Conformity has been issued should be reported as a running change in accordance with section 85.075-33 or 34, whichever is appropriate (or the corresponding sections of the appropriate subpart.

C. Applicability

This Advisory Circular is effective immediately and is applicable to 1974 and subsequent model years for light duty gasoline-fueled vehicles, light duty Diesel vehicles and light duty trucks. For simplification references will only be made to 40 CFR Part 85, Subpart A. Corresponding sections of Subparts B and C should be consulted for Diesel light duty vehicles and gasoline-fueled light duty trucks, respectively.

D. Certificate Coverage and Testing Requirements

Questions that have been raised on these issues are set forth below, together with EPA's resolution of the issues posed:

1. A manufacturer elects to conduct emission tests at the inertia weight corresponding to the higher inertia weight class and a Certificate of Conformity is issued based on those tests.
Question: (a) Does the Certificate of Conformity cover production vehicles which fall into the inertia weight class corresponding to the estimated (i.e., lower) vehicle weight?
(b) What additional tests would EPA require to provide certificate coverage in this case?

Answer: 1a. When a Certificate of Conformity is issued under conditions described above, that certificate will cover production vehicles which fall in both the inertia weight class at which the vehicle was tested and the one immediately below. 1b. No additional testing will be required.

2. A manufacturer elects to conduct emission tests at the inertia weight corresponding to the higher inertia weight class and the test vehicle fails to demonstrate compliance at the elected inertia weight class. (a) Does the manufacturer then have the option to retest the vehicle in the inertia weight class corresponding to the estimated loaded (i.e., lower) vehicle weight? (b) What requirements would have to be met to obtain certification in the higher inertia weight class?

Answer: 2a. Yes, under the following conditions: (i) he must first amend the application for certification to reflect his desire to certify the vehicle in the lower inertia weight class and (ii) the EPA, on the basis of the revised application, will select an appropriate test vehicle following the procedures in §85.075-5. If the same vehicle that failed to qualify in the higher inertia weight class is again selected after the application is revised, it may be retested in the lower inertia weight class. If the manufacturer elects to modify the vehicle in conjunction with a request to test in the lower inertia weight class the procedure outlined in §85.075-30(b)(4)(iii) will be followed. 2b. If the manufacturer elects to modify the vehicle and retest in the higher inertia weight class, he must make the appropriate

amendments to his application and proceed as specified in §85.075-30(b)(4)(iii).

3. A manufacturer elects to conduct emission tests at the inertia weight class corresponding to the estimated loaded vehicle weight (even though this estimated weight is within 100 pounds of being included in the next higher inertia weight class) and is issued a Certificate of Conformity based on those tests. Question: May the same vehicle be tested to demonstrate compliance at the next higher inertia weight?

Answer: 3. The same vehicle which is used successfully to demonstrate compliance at any inertia weight may be used to demonstrate compliance at the next higher inertia weight.

4. A manufacturer elects to conduct emission tests at the inertia weight class corresponding to the estimated loaded weight and the test vehicle fails to demonstrate compliance. Question: May the same vehicle be tested to demonstrate compliance at the next higher inertia weight?

Answer: 4. If the vehicle fails to demonstrate compliance as described above, that same vehicle may not be used to demonstrate compliance at the next higher inertia weight except as provided for under §85.075-30(b)(4)(iii).

E. Procedure for Applying for Inertia Weight Test Option

Manufacturers should request testing at the optional inertia weight in the cover letter to the application. Identification of specific vehicles and calculated and optional inertia weights must be included.